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VIA HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
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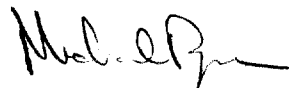
Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Advanced Television Systems and Their Impact upon the
Existing Television Broadcast Service
MM Docket No. 87-268
Reply Comments

Dear Mr. Caton:

Channel 6, Inc., through counsel, hereby files the original and five copies of its reply comments to the Sixth Further Notice of Proposed Rule Making in MM Docket No. 87-268. Please contact the undersigned if you have any questions.

Sincerely,



Ann K. Ford
Michael Ruger

Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

To: The Commission

REPLY COMMENTS

1. Channel 6, Inc., licensee of KCEN-TV, Channel 6, Temple, Texas, and television translator Station K63DL, Bryan, Texas, hereby files these Reply Comments in response to the Commission's Sixth Further Notice of Proposed Rule Making (FCC 96-207, released August 14, 1996) ("Sixth NPRM"). The commenters to this proceeding are overwhelmingly in favor of utilizing all NTSC channels in the transition to DTV. Utilization of all channels, in turn, will provide licensees which currently operate on channel 6 with the ability to return to their original NTSC channel. Furthermore, by utilizing all channels, the risk of displacing translators and LPTV stations is significantly reduced.

Discussion

2. Channel 6, Inc., does not object to the proposed use of channel 40 as the DTV channel for Station KCEN-TV. At the same time, Station KCEN-TV should be afforded the opportunity to return to its original NTSC channel after the transition phase to DTV. Under the "core spectrum" proposal, however, Station KCEN-TV would be precluded from returning to channel 6. There are a number of

reasons why television licensees such as Channel 6, Inc., would seek to return to their original channels. For instance, operation on the original NTSC channel may reduce viewer confusion. Use of the NTSC channel could also reduce equipment and operating costs associated with the transition to DTV. Denying licensees operating on channel 6 the ability to move back to their original channels would place these stations at a significant disadvantage vis-a-vis their competitors. The risk of such a competitive disadvantage is eliminated, however, through the utilization of all available NTSC channels for DTV allotments.

3. The utilization of all NTSC channels will provide additional protection to translators and LPTV stations. Indeed, the Broadcasters' modified DTV Table of Allotments displaces 63% fewer translator and LPTV stations than the FCC's proposal.¹ In addition, the utilization of all channels will eliminate the risk that translators and LPTV stations operating on channels 52 through 69 would be displaced as a result of spectrum reclamation. As a result, the risk that individuals in rural areas, such as those served by Channel 6, Inc.'s translator Station K63DL, will lose over-the-air service is greatly reduced. As noted in Channel 6, Inc.'s previous comments, Station K63DL provides network programming, as well as local news, weather and emergency information, to the residents in and around Bryan and College Station, Texas. Without the translator, Station KCEN-TV's signal would not reach these communities, depriving residents of this

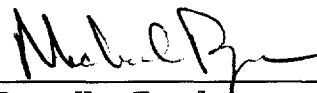
¹See Broadcasters' Comments at 34.

programming service. The Commission's core channel plan, however, would displace channel 63, perhaps permanently. This clearly is not in the public interest.

Conclusion

5. Channel 6, Inc., therefore, supports the use of the entire band of television channels for the transition to DTV. Channel 6, Inc., continues to support the adoption of rules which provide protection for the continued operation of translators and LPTV stations during the transition to DTV, including compensation for displaced translator and LPTV licensees, as outlined in its previous comments.

Respectfully submitted,



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